



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

November 6, 2003

Mr. Jeffrey A. Leed, President
Leed Environmental, Inc.
124 Deborah Drive
Reading, PA 19610

Dear Mr. Leed:

The U.S. Environmental Protection Agency (EPA) has completed its review of the October 27, 2003 revised Groundwater Monitoring Plan (Plan) for the NL Industries, Inc. Superfund Site (Site), located in Pedricktown, New Jersey. The Plan was revised by Construction Services International, Inc. (CSI) to address EPA's September 25, 2003 comments on the draft Plan.

By this letter, EPA approves the Plan, with the following provisions:

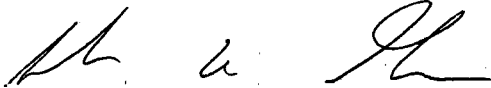
- The Plan states that some monitoring wells may have been damaged during remedial activities. CSI, therefore, intends to utilize turbidity measurements and other field measurements to determine whether or not representative groundwater samples can be obtained from these wells. While this may be an acceptable method for wells in the water table aquifer (eg., MW-27), for wells screened below the water table aquifer, this would not be an acceptable method of determining whether the well seals have been compromised. Therefore, wells screened in the confined aquifer which may have been damaged during remedial activities and are necessary for groundwater investigation must be abandoned and replaced.
- The laboratory selected to perform the chemical analyses should be certified by the New Jersey Department of Environmental Protection (NJDEP) within the last six months to perform the necessary analyses. The laboratory's proof of certification should be provided to EPA prior to performance of these analyses.
- The Plan identifies a number of monitoring wells that will be abandoned in accordance with NJDEP regulations and not replaced. Wells identified include HS, IS, RS and T-C. While EPA concurs that replacement of the above wells is not necessary for the upcoming groundwater monitoring event, EPA reserves the right to require replacement of these wells in the future, if deemed necessary for characterization of Site-related groundwater contamination, or for evaluation and design of a groundwater remedy.

Internet Address (URL) • <http://www.epa.gov>

A specific schedule for abandonment of damaged wells, installation of replacement wells and performance of the groundwater sampling event should be provided to EPA within fourteen (14) calendar days of the date of this letter. Please be aware that a fourteen day waiting period is required between development and sampling of new wells.

If you have any questions regarding this matter, please call.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'J. A. Gowers', with a stylized flourish at the end.

Joseph A. Gowers, Project Manager
Southern New Jersey Remediation Section

cc: P. Harvey, NJDEP



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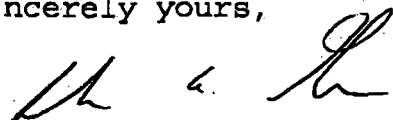
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Joseph A. Gowers, Project Manager
Southern New Jersey Remediation Section

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REGION II
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

EMERGENCY & REMEDIAL RESPONSE DIVISION

DATE

11/6/03

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FAX NUMBER

(215) 656-6797

FROM/OFFICE:

Joe Gowers

PHONE NUMBER

(212) 637-4413

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(212) 637-4429

COMMENTS:

Attached is EPA's approval letter
for the NL Groundwater Monitoring Plan.
Thanks again for your help.

Joe

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EMERGENCY & REMEDIAL RESPONSE DIVISION

DATE

11/6/03

TO/OFFICE:

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(610) 670-7310

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